

THE SWSTIK SAFE DEPOSIT & INVESTMENTS LIMITED

CIN: L65190MH1940PLC003151

Regd. Office: 4th Floor, Piramal Tower Annexe, Ganpatrao Kadam Marg, Lower Parel, Mumbai – 400013

9th July, 2019

The Market Operations Dept.,
BSE Limited
Dalal Street, Fort
Mumbai - 400 023

Dear Sirs,

**Sub: Submission of Annual Secretarial Compliance Report
For the Year ended 31st March, 2020**

In compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith copy of Annual Secretarial Compliance Report dated 30th June, 2020 for the Financial Year 2019-20 issued by our secretarial auditor M/s N L Bhatia & Associates, Company Secretaries.

We request you to take the same on records.

Thanking you,
For The Swastik Safe Deposit & Investments Limited

JITESH KUMAR
AGARWAL

Digitally signed by JITESH
KUMAR AGARWAL
Date: 2020.07.09 21:26:09
+05'30'

Jitesh K. Agarwal
Company Secretary
FCS- 6890

Encl: As above



N L BHATIA & ASSOCIATES
PRACTISING COMPANY SECRETARIES

Tel. : 91-022-2510 0718
Tel. : 91-022-2510 0698
E-mail : navnitlb@hotmail.com
brupadhyay@hotmail.com
Website : www.nlba.in

To,
The Board of Directors,
The Swastik Safe Deposit and Investments Ltd.,
CIN: L65190MH1940PLC003151
4th Floor, Piramal Tower Annexe,
Ganpatrao Kadam Marg, Lower Parel,
Mumbai - 400013 IN

Dear Sir,

Sub: Annual Secretarial Compliance Report for the Financial Year 2019-20

We have been engaged by The Swastik Safe Deposit and Investments Ltd. (hereinafter referred to as the Company') bearing CIN: L65190MH1940PLC003151 whose equity shares are listed on BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.



Date: June 30, 2020
Place: Mumbai

For N. L. Bhatia & Associates
Practicing Company Secretaries
UIN: P1996MH055800
UDIN: F008663B000399680

Bhaskar Upadhyay
Partner
FCS: 8663
CP. No.: 9625



SECRETARIAL COMPLIANCE REPORT OF THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LTD FOR YEAR ENDED MARCH 31, 2020

We, M/s N L Bhatia & Associates Practicing Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by **THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LTD ("the Company")**.
- b) the filings/ submissions made by the Company to the stock exchanges.
- c) website of the Company.
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

for the year ended March 31, 2020 in respect of compliance with the provisions of:

- a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, includes:-

- (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (c) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015.
- (d) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable on the Company.
- (e) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (**Not Applicable during the financial year.**)
- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 ;(**Not Applicable during the financial year).**



- (g) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008, **(Not Applicable during the financial year).**
- (h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2016; **(Not Applicable during the financial year).**
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; **(Not Applicable during the financial year).**
- (j) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable during the financial year).**

and based on the above examination, I/We hereby report that, during the review period:

- a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
None			

- b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.
- c) The following are the details of actions taken against the Company/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:-

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
None				



- d) The Company has taken the following actions to comply with the observations made in previous reports: -

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA				



PLACE: MUMBAI

DATE: JUNE 30, 2020.

For N. L. Bhatia & Associates
Practicing Company Secretaries
UIN: P1996MH055800
UDIN: F008663B000399680

Bhaskar Upadhyay
Partner
FCS : 8663
COP:9625